

*United States District Court
For The State of Delaware*

Prince Allen Marsh

V.

*Delaware State University
1200 N. Dupont Highway
Dover, Delaware 19901*

*Notice of Motion
for a Preliminary Injunction*

Civ. No 05-087-JJF

Dr. Charles Smith, Vice President of Enrollment, Management & Student Affairs. Mr. Drexel Ball, Assist to the President/ Ms. Kay Moses, Director of Judicial Affairs. Ms. Lowan Pitt, in there Individual and Official Capacity.

Please take notice that upon the annexed affirmation of Prince Allen Marsh, affirmed March 2, 2005 and upon the complaint, Plaintiff will move this Court, Honorable Joseph J. Farman, Jr. , U.S.D.J, Lock Box 18, 844 King Street U.S Court House, Wilmington , Delaware 19801.

On the day of March 19, 2005 at 11:00 am or soon thereafter as Plaintiff can be heard, for an order pursuant to Rule 65 of the federal rules of Civil Procedure enjoying defendants to Honor Plaintiff's five year Scholarship by allowing him to continue attending classes at Delaware State University with room and board included, also stop the defendants from submitting any further Derogatory Statements involving matters stated in the complaint to perspective schools in which the Plaintiff may seek to attend.

*Dated: Westchester, New York
March 2, 2005*

Signed *P. Marsh*

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2005 MAR -8 PM 3:57

*United States District Court
For the State of Delaware*

Prince Allen Marsh

V.

*Delaware State University,
Dr. Charles Smith, Mr. Drexel Ball,
Ms. Lowan Pitt, Ms. Kay Moses*

Affirmation"

*State of NewYork} ss:
County Of Westchester}*

Prince Allen Marsh makes the Following affirmation under the Penalty of Perjury:

I Prince A. Marsh, am the Plaintiff in the above entitled action and respectfully move this Court to issue an order enjoying , Delaware State University, Dr. Charles Smith, Mr. Drexel Ball, Ms. Lowan Pitt, Ms. Kay Moses, from submitting any and all information relating to Plaintiff's off Campus arrest, issuing any further derogatory statements to any place of education that request Plaintiff's Academic or Judicial records.

Furthermore, enjoying defendants to honor Plaintiff's five year Scholarship by allowing me to return to his classes, being fully reinstated room& board, until a final disposition on the merits in the above entitled action. Unless this order is issued, I will continue to suffer immediate and irreparable injury, loss and damage in that I am presently being denied the continuance of my immediate and present future, education and the future Well-Being of My Child Prince Edward Marsh. My athletic endeavors and future of participating in the Olympics etc, etc.

Delaware State university in there practices have denied me my Life and Liberty of my Constitutional Guarantees. I have repeatedly contacted the defendants on numerous occasions by phone and first class mail seeking that they review there practices. I have directly spoken to Mr. Drexel Ball and mailed him a letter addressed to the Board of Directors and have received no response in writing from neither of them. My last conversation with Mr. Ball pertaining to this action I stated to Mr. Ball "his superior Dr. Sessions would be disappointed to have left him in charge (due to the President being out of town) and Mr. Ball knowing the incidents which are

taking place and (Mr. Ball) not attempting to resolve them, I Asked him why not resolve this issue now instead of taking it to the extreme where it would look not good for him being that he is the second in command. Mr. Ball stated the only alternative at resolving this matter would be to bring this issue to court and if that was to occur it could be years". I attempted to reason with Mr. Ball why do issues have to go to the extreme to be resolved when this issue could be resolved fairly and without cost for I could not afford to bring this action to court.

As can be seen from the foregoing, I have no adequate remedy at Law. Wherefore, I respectfully request that the Court issue a preliminary Injunction as described above, as well as such other and further relief as may be just and proper. I Thank You.

I declare under penalty of Perjury that the foregoing is true and correct.

Executed on March 2, 2005

Mr. Prince Allen Marsh

A handwritten signature in dark ink, appearing to read "P. Marsh", written below the printed name.